



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 5, 2014

Ms. Lisa Wood
SEPA/NEPA Coordinator
WDFW Regulatory Services Section
600 Capitol Way North
Olympia, WA 98501-1091

Re: Wiltzius Ditch Maintenance Dredging, File # 14-083

Dear Ms. Wood:

Thank you for the opportunity to comment on the Determination of Nonsignificance regarding the proposal to clear obstructions, maintain current ditch banks, and keep ditch contained as it has been to include the removal of approximately 1,000 cubic yards of sediment within the banks of each ditch (Proponent-Michael J. Glorfield). The Department of Ecology has reviewed the documents and submits the following comments:

Water Quality Program

This proposed dredging site is not a roadside ditch as suggested, but instead is a major perennial tributary to Imbler Creek. The low gradient stream has lost much of its sinuosity and structure due to previous modification for agricultural activities. The current proposed dredging activity will again alter morphology (disconnect floodplain, reduce channel stability, maintain shortened stream length and lower sinuosity) and cause sediment, nutrient, temperature, and dissolved oxygen problems. The proposed dredging will undoubtedly have negative water quality consequences.

The following activities should be required to minimize water quality impacts:

- Construct an appropriate V-channel shape not to exceed three feet in depth at the lower end of the project.
- Remove and spread the dredged spoils in upland locations to prevent dredged material from reentering the channel. The DNS seems to suggest a dike or deposit dredged material in a near stream location. The near stream location will have negative water quality and habitat consequences.

- Institute short-term erosion control measures (straw/fabric) until perennial grass seeding and establishment occur.
- Establish a filter strip 35 feet wide on either side of the dredged channel to stabilize the channel and reduce the need for on-going maintenance dredging. Cost-share programs are available to help with its funding.

You may contact Chad Atkins at the Washington State Department of Ecology Water Quality Program at (509) 329-3499 or <http://www.ecy.wa.gov/ecyhome.html> if you have questions about this comment.

State Environmental Policy Act (SEPA)

Ecology's comments are based upon the information submitted for review. As such, they do not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

Sincerely,
Cindy Anderson for:



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cc: Michael J. Glorfield